

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MOHAMMED QURESHI, ALIYA	)	
JABEEN, Z.Q., a minor, by her next friend	)	
MOHAMMED QURESHI, and S.Q., a	)	
minor, by his next friend, MOHAMMED	)	
QURESHI,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No.
	)	
FOREMAN BROS., INC., a Michigan	)	
Corporation,	)	
	)	
Defendant.	)	

**COMPLAINT AT LAW**

NOW COMES the Plaintiffs, MOHAMMED QURESHI, ALIYA JABEEN, Z.Q, a minor, by her next friend MOHAMMED QURESHI, and S.Q., a minor, by his next friend MOHAMMED QURESHI, by and through their attorneys, STAVELAW GROUP, P.C., complaining of the Defendant, FOREMAN BROS., INC., and states as follows:

1. This is a civil action for personal injuries. The jurisdiction of this Court is conferred by 28 U.S.C. § 1332 due to the diversity of the parties and the amount in controversy exceeding \$75,000.00.
2. Plaintiffs are, at all relevant times, residents of DuPage County, Illinois.
3. Defendant FOREMAN BROS., INC., is and was, at all times relevant, a Michigan Corporation engaged in the freight transportation business and doing business within the jurisdiction of the Northern District of Illinois.

4. On or about November 23, 2016, Plaintiff MOHAMMED QURESHI was operating a vehicle in an eastbound direction on or about Interstate 76 at or near Milepost 226, in the City of Canfield, County of Mahoning, and State of Ohio.
5. That at the aforesaid time and place, Plaintiffs ALIYA JABEEN, Z.Q., and S.Q., were riding as passengers in the vehicle operated by MOHAMMED QURESHI.
6. That on or about November 23, 2016, CHARLES WARD, as an agent of Defendant FOREMAN BROS., INC., was operating a motor vehicle owned by and on behalf of Defendant FOREMAN BROS., INC., in an eastbound direction on or about Interstate 76 at or near Milepost 226, in the City of Canfield, County of Mahoning, and State of Ohio.
7. At all times herein mentioned, CHARLES WARD was acting as a duly authorized agent of Defendant FOREMAN BROS., INC.
8. That at the aforesaid time and place, a collision occurred between Plaintiffs' vehicle and the vehicle that CHARLES WARD was operating when CHARLES WARD rear-ended Plaintiffs' vehicle.
9. That at all times material hereto it was the duty of the Defendant, its agents, and employees to exercise ordinary care in the ownership, operation, maintenance, and control of said vehicle for the safety of the person and property of others there and then upon said roadway and especially the Plaintiffs herein.
10. That in violation of this duty, Defendant, its agents, and employees acted or failed to act in one or more of the following ways, amounting to negligent conduct and violating the Motor Vehicle Laws of the State of Ohio:
  - a. Operated said motor vehicle without keeping a proper and sufficient lookout;
  - b. Proceeded at a speed which was greater than reasonable and proper with regard to traffic conditions in the use of the way, or which endangered the safety of the Plaintiffs;

- c. Failed to decrease the speed of said motor vehicle so as to avoid colliding with another vehicle;
  - d. Failed to equip said motor vehicle with proper brakes;
  - e. Failed to keep said motor vehicle under proper control and failed to stop, slow down, or otherwise alter the speed, movement or direction of said vehicle when danger of collision with another vehicle was imminent;
  - f. Followed the motor vehicle which Plaintiffs were in more closely than was reasonable and prudent, having no regard for the speed of traffic upon the way;
  - g. Failed to give audible warning with said motor vehicle's horn of the approach of said motor vehicle, although such warning was necessary to ensure the safe operation of said vehicle.
11. That as a direct and proximate cause of Defendant and its agents aforesaid careless and negligent acts and/or omissions, Plaintiffs were caused to sustain personal injuries, to incur and pay medical and hospital expenses, and to be absent from their usual pursuits for a period of time.

WHEREFORE, the Plaintiffs, MOHAMMED QURESHI, ALIYA JABEEN, Z.Q, a minor, by her next friend MOHAMMED QURESHI, and S.Q., a minor, by his next friend MOHAMMED QURESHI, prays for judgment against the Defendant, FOREMAN BROS., INC., in an amount in excess of \$75,000.00 dollars, plus court costs, attorney's fees, and for whatever other relief this Court deems just and appropriate.

Respectfully submitted,

STAVAR LAW GROUP, P.C.

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